

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : SEALED  
INDICTMENT

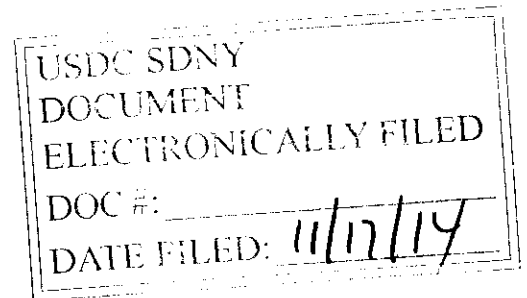
- v. - :

HARRY SANTANA, : S1 14 Cr. 736  
a/k/a "Twin," :  
DENISE GONZALEZ, :  
MICHAEL GONZALEZ, and :  
MICHAEL PETERKIN, :

Defendants. :

- - - - - x

COUNT ONE



The Grand Jury charges:

1. From at least in or about December 2013, up to and including in or about August 2014, in the Southern District of New York and elsewhere, HARRY SANTANA, a/k/a "Twin," DENISE GONZALEZ, MICHAEL GONZALEZ, and MICHAEL PETERKIN, the defendants, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that HARRY SANTANA, a/k/a "Twin," DENISE GONZALEZ, MICHAEL GONZALEZ, and MICHAEL PETERKIN, the defendants, and others known and unknown, would and did distribute and possess with intent to

distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that HARRY SANTANA, a/k/a "Twin," DENISE GONZALEZ, MICHAEL GONZALEZ, and MICHAEL PETERKIN, the defendants, conspired to distribute and possess with intent to distribute was 28 grams and more of mixtures and substances containing a detectable amount of cocaine base, in a form commonly known as "crack," in violation of Title 21, United States Code, Section 841(b)(1)(B).

#### Overt Acts

4. In furtherance of the conspiracy and to effect the illegal object thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about December 17, 2013, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 10 bags of "crack" cocaine to an undercover officer working for the New York City Police Department ("UC-1"), in exchange for approximately \$100, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

b. On or about January 9, 2014, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 11 bags of "crack" cocaine to UC-1, in exchange for approximately \$100, in

the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

c. On or about January 22, 2014, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 10 bags of "crack" cocaine to UC-1, in exchange for approximately \$100, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

d. On or about February 5, 2014, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 18 bags of "crack" cocaine to UC-1, in exchange for approximately \$150, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

e. On or about February 22, 2014, DENISE GONZALEZ, the defendant, sold approximately 21 bags of "crack" cocaine to UC-1, in exchange for approximately \$200, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

f. On or about March 19, 2014, DENISE GONZALEZ, the defendant, sold approximately 21 bags of "crack" cocaine to UC-1, in exchange for approximately \$200, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

g. On or about April 5, 2014, HARRY SANTANA, a/k/a "Twin," and DENISE GONZALEZ, the defendants, sold

approximately 21 bags of "crack" cocaine to UC-1, in exchange for approximately \$200, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

h. On or about June 5, 2014, DENISE GONZALEZ, the defendant, sold approximately 30 bags of "crack" cocaine to UC-1, in exchange for approximately \$300, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

i. On or about July 8, 2014, MICHAEL GONZALEZ and MICHAEL PETERKIN, the defendants, sold approximately 40 bags of "crack" cocaine to UC-1, in exchange for approximately \$400, in the vicinity of 1590 Hutchinson River Parkway, and Wilkerson Avenue and Edison Avenue in the Bronx, New York.

j. On or about July 31, 2014, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 35 bags of "crack" cocaine to UC-1, in exchange for approximately \$300, in the vicinity of 1590 Hutchinson River Parkway in the Bronx, New York.

k. On or about August 12, 2014, HARRY SANTANA, a/k/a "Twin," the defendant, sold approximately 58 bags of "crack" cocaine to UC-1, in exchange for approximately \$500, in the vicinity of 1600 Parkview Avenue in the Bronx, New York.

(Title 21, United States Code, Section 846.)

### FORFEITURE ALLEGATION

5. As a result of committing the controlled substance offense alleged in Count One of this Indictment, HARRY SANTANA, a/k/a "Twin," DENISE GONZALEZ, MICHAEL GONZALEZ, and MICHAEL PETERKIN, the defendants, shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendants obtained directly or indirectly as a result of the offense, and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense alleged in Count One of this Indictment.

### SUBSTITUTE ASSET PROVISION

6. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- a) cannot be located upon the exercise of due diligence;
- b) has been transferred or sold to, or deposited with, a third party;
- c) has been placed beyond the jurisdiction of the Court;
- d) has been substantially diminished in value;

or

e) has been commingled with other property which cannot be subdivided without difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Section 853.)

Kelvin Moreaux 11/17/14  
FOREPERSON

Preet Bharara  
PREET BHARARA  
United States Attorney

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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SEALED INDICTMENT

Sl 14 Cr. 736

(Title 21, United States Code, Section 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

*Kelvin Moreaux*

Foreperson.

*11/17/14 - Filed Sealed Indictment  
ac  
H/w issued.  
Judge Fox  
LMD*